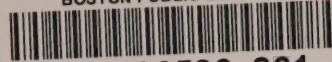


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# BOSTON'S

Application for funding under the

## **AIR QUALITY TECHNICAL ASSISTANCE PROGRAM**

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December 1, 1978





BOSTON'S  
Application for Funding Under The  
AIR QUALITY TECHNICAL  
ASSISTANCE PROGRAM

Prepared For  
THE CITY OF BOSTON  
KEVIN H. WHITE, MAYOR

By The  
Boston Redevelopment Authority  
Robert J. Ryan, Director

With the assistance of:

Boston Air Pollution Control Commission, Eugenie Beal, Executive Director  
Boston Office of Management and Budget, Jerry Mechling, Director  
Comprehensive Economic Development Strategy (CEDS), John Drew, Chairman  
Boston Office of Federal Relations, Brian Dacey, Director  
Boston Energy Office, Dean Nikitas, Director  
Massachusetts Department of Environmental Quality and Engineering  
Metropolitan Area Planning Council  
EPA Region One, Air Branch, Mel Holman, Director

We gratefully acknowledge the assistance of the following:

Professor Marc Roberts, Harvard University School of Public Health  
Clark-McGlennon Associates, John McGlennon, Chief Consultant  
GCA Technology, John Willson, Chief Consultant  
Walden Division, Abcor  
Professor Steven Thomas, Harvard University School of Public Health  
Wallace, Floyd, Ellenzweig and Moore







November 30, 1978

Mr. Douglas M. Costle, Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Costle:

I am pleased to submit Boston's application for an Air Quality Technical Assistance grant. Our proposal presents an unusual opportunity for Boston and for the rest of the nation: an opportunity to find out if an older, economically distressed city can protect its environment without sacrificing the economic growth needed to provide jobs for its unemployed.

Since 1968 the Boston Air Pollution Control Commission and other city agencies have aggressively pursued opportunities to reduce the emission of pollutants in Boston. Boston's parking freeze and, most recently, the creation of a downtown pedestrian mall are testimony to Boston's commitment to cleaning its air. In the area of economic development the Boston Plan and the Comprehensive Economic Development Strategy Committee represent Boston's commitment to re-establishing its economy on a basis reflecting the realities of the last quarter of this century. The scope and intensity of ongoing economic development compared to twenty years ago testifies to the value of a comprehensive approach to economic revitalization in older cities like Boston.

Under the 1977 Clean Air Act, further economic development in Boston will be stymied, as it would be in many other older cities, unless an effective strategy is developed to capture and distribute offsets to provide clean air space for new development.

Boston's application is unusual, and I believe exciting, in that it proposes that the city actively participate in a strategy to capture and distribute offset in order to provide clean air space for industrial development consistent with our comprehensive economic development needs.





Boston is an unusual city in that it is a relatively small part of its air quality district. While this means that Boston will only be able to actively solve part of the region's problems, no other unit of government or regional agency exists to take the lead in reconciling the region's economic development strategy with the 1977 Clean Air Amendments.

We plan to coordinate a process which will enable other jurisdictions in Metropolitan Boston and our air quality region to implement strategies to pursue the twin goals of economic development and environmental protection. We plan to work with the Massachusetts Department of Environmental Quality Engineering and the Metropolitan Area Planning Council in this effort.

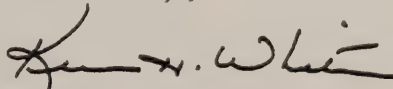
Our proposal also involves direct assistance to other areas in the region. The technical assistance portion of this application is designed to provide information and economy-of-scale opportunities to regional trade organizations, not simply to City of Boston merchants.

In addition to helping other cities and towns, I believe the Boston proposal has the potential to be a successful example which could be replicated in other older and distressed cities of which Boston is prototypical.

Boston is also unusual in that it is surrounded by the academic talent to make a difficult and innovative program work. We have taken advantage of the resources of Harvard University in developing this grant application and we plan to continue to take advantage of this relationship if the grant is awarded.

Providing economic opportunity for the urban unemployed without sacrificing progress on cleaning the air is a challenge every mayor will have to face in the years ahead. I look forward to getting an early start on that challenge.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin H. White", written in a cursive style.

Kevin H. White  
MAYOR

KHW/sef





# **Boston Redevelopment Authority**

Robert J. Ryan, Director

November 30, 1978

Mr. Douglas M. Costle, Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Costle:

The Boston Redevelopment Authority Staff prepared this application with the assistance of Boston's economic development and environmental protection officials, air pollution and economic development consultants and university economists and air pollution experts. This approach is indicative of the manner in which Boston now approaches economic development and environmental protection.

We look ahead to years in which further industrial development will be frozen and existing industry will be threatened unless effective action is taken to create and distribute clean air space. This threatens the progress Boston has made, with the assistance of substantial federal support from the Department of Housing and Urban Development and the Department of Commerce and the commitment of city energy and resources, in making Boston's neighborhoods desirable places to live and Boston an attractive place to do business. In particular, it now appears that funding of future Urban Development Action Grants for Boston will be contingent upon offset acquisition.

Continuing the progress which Boston has made in the past few years now hinges on our ability to comply with the 1977 Clean Air Act Amendments, to develop an economic strategy consistent with the federal law and the SIP. Our clean air efforts to date have been substantial: Boston has aggressively limited downtown driving and encouraged the use of clean fuels to address the city's unacceptable air pollution problem. I believe that we are proposing a further effort which is manageable and holds the promise of complying with the 1977 law while reinforcing our economic development strategy.



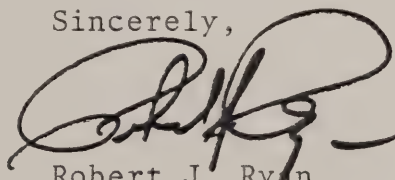


Boston now has an Economic Development Committee which judges applications for tax incentives for industrial development, a body which would naturally provide guidance on the allocation of City-owned or controlled air space. This body consists of Edward Sullivan, Boston's Vice Mayor; James Young, Deputy Mayor for Fiscal Affairs and myself as Director of the BRA. Boston also has a Comprehensive Economic Development Strategy staff which is prepared to provide much of the technical support needed for such decisions. Moreover, the planning, analysis and technical assistance which we propose in this application complements existing activities of the BRA staff and other city agencies.

We believe that Boston has a number of advantages as a test city. Boston has an air pollution problem which is significant enough to test the feasibility of city involvement in the offset market, is small enough that we can get a program like this off the ground quickly and effectively at a budget consistent with the constraints of the AQTA RFP, and has a strong institutional base for economic development.

Development of a strategy to implement the 1977 Clean Air Amendments will be one of the most critical activities in which the BRA will be involved in the next few years. We hope to turn the new requirements of the Clean Air Act of 1977 to our economic as well as environmental advantage, setting a pattern which can be followed by other cities and towns in the region and in the nation.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Ryan', with a stylized flourish at the end.

Robert J. Ryan  
Director





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I. EXECUTIVE SUMMARY





## I. Executive Summary

Analytic Framework: Implementation of the 1977 Clean Air Act Amendments potentially conflicts with economic development goals in older distressed cities such as Boston. The public interest in job creation in high-unemployment areas and job categories is a reason for public intervention in the market in offset rights. Technical assistance and other aid to help selected firms meet SIP standards is similarly justified. Further, City governments may themselves have the potential to be efficient producers of offset. Boston's AQTA application is designed to finance the development and application of market intervention, production, and distribution strategies in the offset market to serve economic development objectives.

Problem Statement: Boston is in non-attainment of ambient air quality standards for hydrocarbons and carbon monoxide. Continuation of the City's on-going progress in economic development therefore requires the creation of sufficient offset rights, particularly for hydrocarbons, to accommodate new or expanded enterprises, particularly those which create the blue-collar industrial jobs most likely to be filled by Boston's unemployed. Carbon monoxide emissions will be reduced as strict federal automobile standards take effect. For all other pollutants for which we are in attainment, margins for growth will require PSD credits. Existing jobs are potentially in jeopardy, both from financial/technical difficulties which some employers may face in meeting the requirements of the State Implementation Plan, and buy-out offers from suburban firms in need of "air space."\*

### Strategies

#### Strategy One: Creating Offset

The City will create its own offset by reducing its own emissions and emission-generating activities beyond the requirements of the SIP.

The City will create offset by assisting and in some cases requiring beneficiaries of programs and subjects of City regulations to exceed SIP.

#### Strategy Two: Distributing Offset

The City will use the offset thus acquired to aid new and expanding firms in accordance with an analytic methodology to be developed and implemented consistent with Boston's Comprehensive Economic Development Strategy.

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\*We are using the words "air space" to mean the availability of legal sanction for new or increased emissions under an approved SIP. Depending on the regulations in the SIP, air space can be created by a direct trade-off (acquisition of offset), by "growth cushion" or a decrease in overall pollution levels below that required by the SIP.





### Strategy Three: Establishing an Offset Information Clearinghouse

The City will provide brokerage, and in some instances subsidies, for offset acquisition for desirable firms, and attempt to discourage buy-outs with unfavorable economic impacts.

### Strategy Four: Providing Technical Assistance

The City will provide technical assistance to existing firms which need such assistance to meet SIP requirements. This assistance will be allocated according to the potential for real economies (e.g. organizing several dry-cleaning plants to jointly buy emission-control design work or arranging for an industry-wide technical briefing) and the likelihood and potential economic impact of shutdowns in the absence of such assistance. The City will assist firms outside of Boston as well as within the City limits in order to provide regional economies of scale in areas such as mass buying of emission-control equipment and in order to extend the program to other jurisdictions which share and contribute to our regional air pollution problem. Funds provided by the sale of offsets will maintain on-going technical assistance and offset market assistance programs.

### Strategy Five: Providing Financial Assistance

The City will provide subsidies in the form of tax agreements, the sale of offset at or below market prices, and in other appropriate forms in order to encourage desirable but economically marginal firms to start up, expand, or remain in business. The City will assist firms to produce and market offset, with particular attention to instances in which genuine economies can be created with City assistance.

### Evaluation

Evaluation will be an on-going process to begin as soon as activities under the grant are initiated. The evaluation will be conducted by a committee of business, community, governmental and technical representatives. Special concern will be taken to include regional and state as well as City officials. Academic and private consulting will also be a part of this process.





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## II. AIR QUALITY IN BOSTON



## II. Air Quality in Boston

### Existing Conditions

Air quality in Boston is better today than it was ten, or even five, years ago. However, many problems remain and pollution levels must be lowered further. The Metropolitan Boston Air Quality Control District (MBAQCD) is frequently in violation of federal standards for carbon monoxide and ozone, although the summers of 1977 and 1978 showed some improvement (expressed in number of days above the standard) over the summer of 1976.

Carbon Monoxide (CO) and hydrocarbons (classified as pollutants as they are precursors of ozone) will be significantly controlled by transportation measures in the Mobile Source section of the SIP and by improved pollution control equipment on new autos, as prescribed by law. However, Boston exceeds federal standards for hydrocarbons by 70%. Approximately 30% of hydrocarbons come from stationary sources and hence must be addressed by control of emissions from existing and new plants.

The MBAQCD is, or is expected to be, designated "attainment" for the other three major pollutants under the NAAGS: NO<sub>2</sub>, SO<sub>2</sub> and TSP (announcement of attainment status is expected for the latter).

### Stationary Sources

Stationary sources are main contributors of sulfur oxides, particulates and nitrogen oxides. The major stationary sources of air pollution in Boston include:

	<u>% of Total Pollutant Level</u>		
	SO <sub>2</sub>	Part	NO <sub>x</sub>
Steam Electric Power Plant	46%	11%	26%
Residential Heating	5%	14%	36%
Commercial & Industrial Sources	46%	41%	16%
Incinerators	.2%	18%	.6%

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Source: Mass. Department of Environmental Quality Engineering

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Lesser amounts of emissions come from restaurants, dry cleaners, auto body shops and other small businesses. These small-source emissions, in aggregate, constitute a large part of the pollution problem.





Proper maintenance of machinery, along with low-sulfur-content fuel requirements, can control much of the emission problem from boilers and fuel-burning equipment. Control devices are also available for these sources.

### Mobile Sources

Mobile sources are main contributors of carbon monoxide and hydrocarbons. In Metropolitan Boston more than 99% of the carbon monoxide comes from transportation, mainly from cars. The CO problem is very localized, with the highest CO levels along heavily travelled local routes, at intersections, and along highways. With increasing distance from the road, the CO levels drop very significantly.

Transportation sources in Metropolitan Boston contribute up to 70% of hydrocarbons (from exhaust pipes of cars). Hydrocarbons are the precursors of ozone, a very strong oxidant with toxic effects. In contrast to CO, ozone is a regional problem; highest levels are not measured in the vicinity of its precursors but several miles downwind; for example, in the suburbs or even rural areas.

Mobile sources can also emit NO<sub>x</sub>, particulates and minor amounts of SO<sub>2</sub> and sulfate. For Metropolitan Boston the following amounts have been calculated:

Nitrogen Oxides	53.8%
Particulates	15.19%
Sulfur Oxides	1.9%

Particulates include lead, sulfates (from exhaust pipes), and chlorides (from snow removal) and silicates (mainly road dust).

### Boston Air Pollution Control Commission

The City of Boston Air Pollution Control Commission (BAPCC) was created in 1968 to regulate and control atmospheric pollution in Boston as provided by Massachusetts General Laws, Chapter XXX, Section 31C. The Commission initiated legislation requiring that only low-sulfur oils be burned in the City, a regulatory requirement which was later adopted by the entire Commonwealth. The current attainment for the sulfur dioxide standard may be credited to this assumption of leadership by the City.

Current duties of the Commission include regulation of abrasive blasting, including inspection of facilities, investigation of complaints and reported violations. After 1973, the Commission was charged with regulation of new off-street parking in Boston Proper, in accordance with the Boston Transportation Control Plan.





Under this plan a parking "freeze" was established limiting the parking spaces available to the general public in Boston Proper (the downtown area) to the number of spaces that existed in that area on October 15, 1973. The BAPCC maintains a "bank" of spaces removed and issues parking freeze permits to new lots. The bank now has 273 spaces available for allocation. The Commission established procedures and criteria for allocating available spaces. Violation of regulations has led to suspension of permits.

Major objectives of the freeze program (as an element of the Boston Transportation Control Plan) are reduction of vehicle miles travelled (VMT), reduction of spaces available to all-day parkers, whose travel exacerbates peak-hour traffic, and ultimate replacement of many open lots by well-located garages. Three such garages have been permitted to date, and the application of a fourth will be heard in December. In each case, the permit issued has required elimination of specified compensatory spaces in the vicinity before the garage could be opened to the public.

Surrounding the downtown freeze area, an area of restricted parking has been established. Approval of the Board of Zoning Appeal is required before commercial parking facilities may be opened or expanded in this area.

Another major City undertaking is the recent opening of the Downtown Crossing, an auto-restricted zone (ARZ) in the retail district. In this area, general traffic is excluded, bus service increased, hours of delivery vehicles limited to the morning hours before 11:00 A.M., and taxis excluded until after 6:00 P.M. The program has produced a more pleasant environment for shoppers, with less auto-related pollution and noise. Although no hard data is available, many people have commented on the perceptible improvements in air quality in the ARZ area. The ARZ was planned by the Boston Redevelopment Authority (BRA) in conjunction with local merchants, building owners, and business associations. It was developed as a coordinated effort by the BRA, City of Boston, local merchants, and the regional transit authority (MBTA). Funding (\$3.3 million) was provided by the Federal Department of Transportation with matching funds from the Commonwealth of Massachusetts.

Staff of the BAPCC has been involved in the public process leading to the development of the Massachusetts SIP. In addition, Air Pollution Control Commission staff monitors state and Federal policy regarding air pollution control and makes recommendations to the Mayor on appropriate City response. It also reviews the environmental statements of any project that is likely to have a negative impact on air quality in Boston and participates in the A-95 and other review processes.



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## III. ECONOMIC CONDITIONS IN BOSTON





### III. Economic Conditions in Boston

Boston's economic base has undergone considerable change over the last 25 years. Once a manufacturing center, Boston has shifted to greater dependence on service industries. Boston is a regional center for services including banking, insurance, finance and the law, a position which has fostered the continued growth and importance of services to Boston's economy.

The growth in the service sector, up until the 1970's, had offset Boston's long-term losses in manufacturing, trade and construction. The recessions of 1971-1972 and 1974-1975 had severe impacts on Boston on all employment fronts and contributed to the loss of 58,000 jobs between 1970 and 1977. These losses more than wiped out the gains made during the 1960's and today, Boston has 20,000 fewer jobs than in 1960.

Boston's economic situation is marked by:

- o A 9.3% unemployment rate, 50% above the national average, and more than twice the rate in Boston in 1970.
- o A decreasing ratio of new jobs captured by City residents.
- o A per capita income level (\$5,570 in 1975) of Boston residents 40% lower than that of commuters.

Boston is suffering from the population loss experienced up to 1970 which contributed to housing deterioration and abandonment in older neighborhoods, and the decline of neighborhood commercial centers. Low incomes translate into less investment in housing, less local purchasing power, and contribute to rising inner-city problems of crime, deterioration and private sector disinvestment.

Although property tax revenues have increased, they have not fully reflected the City's economic growth, in part because property wealth has not risen commensurately with incomes. The loss of manufacturing has been replaced by a thriving service sector, which requires less capital investment and thus less tax base per worker. The City therefore needs more industry from its own fiscal perspective as well as for employment purposes.





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#### IV. EXISTING ECONOMIC DEVELOPMENT PROGRAMS



#### IV. Existing Economic Development Programs

The success of the City's economic development program can be measured by the total annual public-plus-private investment in Boston, which more than doubled (in constant dollars) from 1960 (\$600 million) to 1975 (\$1.25 billion).

A recent survey revealed some \$5 billion of private development proposals and public sector projects in the advanced planning stage. Many of these proposals cannot proceed without investment in public infrastructure; total needs in this sector were estimated at the time of the survey at \$500 million.

Boston's public investment programs include the largest urban redevelopment program in the country on a per capita basis, totaling \$1.5 billion since 1959. Additionally, since January 1975, the Neighborhood Improvement Program has focused Community Development Block Grant and Capital Budget funds on neighborhoods.

These federal programs, as well as others such as the Urban Development Action Grant program, have generated substantial progress. Yet, considerable development potential is waiting in the wings.

##### Planning for Economic Development

The Boston Plan, launched in 1977, was designed during these times of fiscal austerity to channel public investment for maximum leverage of private investment. The Plan's four areas -- Blue Hill Avenue, Boston Harbor, Columbia Point, and Hyde Park -- have been targeted for testing new City initiatives in planning and coordinating development strategies for housing, transportation, energy, commercial and industrial development, as well as human services and manpower training.

Boston's Comprehensive Economic Development Strategy (CEDS) was developed in response to the City's designation in April, 1978, as a demonstration "CEDS" area by the Economic Development Administration. As promulgated by EDA, CEDS is to be based on a rational economic development process calling for integrated funding from local, state and federal sources.

Boston's first CEDS document has been prepared in conformance with EDA requirements and has been submitted to EDA.





## The CEDS Process

Overall CEDS program responsibilities occur at three levels:

The CEDS Staff Policy Committee: staff representatives of City agencies having major economic development responsibilities convene regularly to integrate agency contributions toward developing and implementing specific programs and projects. Their recommendations are reviewed by the Boston Plan Policy Committee and CEDS Committee.

The Boston Plan Executive Policy Committee: City executives composing this committee make major policy and program decisions regarding the direction of City efforts, including but not restricted to the Boston Plan.

The CEDS Committee: The CEDS Committee has major responsibility for reviewing and approving the CEDS document and its updates and amendments. This Committee has members from City government, business and community groups.

### CEDS Goals and Priorities

The following are the goals of CEDS,

1. Increase the number and quality of jobs for Boston residents in order to reduce unemployment and increase real income.
2. Encourage the growth and diversification of Boston's tax base.
3. Target infrastructure improvements to those areas having the greatest potential for fostering job-creating industrial and commercial development.
4. Promote and preserve the stability of neighborhoods as places to live and do business.

For each goal, specific policy statements and program strategies have been proposed. While CEDS has as its primary focus the formulation of the City's economic development strategies, it must include planning for the full range of the City's concerns.

Air pollution control strategies were not included in Boston's preliminary CEDS because the City's understanding of the relationships involved was still rudimentary. The proposed Air Quality Technical Assistance Demonstration Program would enable Boston to refine its CEDS goals, policies and criteria to incorporate specific strategies to mitigate the potentially negative environmental impact of future development.



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V. BOSTON'S AIR QUALITY TECHNICAL  
ASSISTANCE PROPOSAL





## V. Boston's Air Quality Technical Assistance Program

Boston's Air Quality Assistance Program is designed to achieve two goals: the creation of air space to allow for expansion existing industries and new growth; and assisting firms to deal with the financial and technical problems of complying with the provisions of the revised SIP. The following strategies describe the basic components of our program.

### Strategy I: Creation of Emission Offsets.

A large municipal government such as the City of Boston represents a major user of polluting materials, most of which are not controlled under the SIP. Also through its regulatory functions, facilities maintenance, and housing programs, the amount of emissions which the city potentially controls is substantial.

The plan proposed by the City of Boston for demonstration that this potential source of offset can be acquired and administered by the municipal government involves three general steps:

- o Development of an emissions inventory for City-controlled sources.
- o Performance of a cost/benefit analysis and implementation of those controls which are determined to be cost-effective.
- o Municipal and City-wide energy conservation program.

Task 1: Development of Emission Incentives for City-Controlled Sources. The principal focus of this study will be hydrocarbons, the most serious pollution problem in the Metropolitan Boston area. The source of hydrocarbons in an urban environment are many. Dry cleaning, degreasing, printing, gasoline handling and painting are a few of the common activities which contribute to atmospheric hydrocarbons.

Among the activities which can be potentially controlled and should thus be inventoried are centralized gasoline handling and filling facilities used by police vehicles, DPW equipment and, possibly taxi fleets; road paving operations, particularly the use of cutback asphalt; the quantity of oil-based paints applied to City buildings and housing projects; the use of degreasers and spray paints in City garages; and the amount of solvents lost in City-run printing facilities. The needed information gathered will include both the quantities of hydrocarbons in use and the controls which are presently being practiced.

The level of control which will be a part of the SIP is presently unknown for many of these source categories. It is expected, however, that there will be room for further controls. Some examples of the types of controls which would be evaluated for implementation are suspension of the use of cutback asphalt in road paving and roofing operations; installation of Stage II gasoline recovery techniques at all city-run facilities; prohibition of the use of oil-based paints; installation of vapor recovery systems in all city-run garages; and requirement of highly effective recovery systems for printing plants.



Task 2: Performance of Cost-Benefit Analysis. A cost/benefit analysis will be made for each option. Those controls which appear to be the most promising will be put into effect, providing the city with an offset which it can then make available to desirable employers.

The program can be expanded to include existing sources other than those operated or regulated by Boston. Through tax tradeoffs, the cost of controls for private companies can be covered. The City will recover the tax reduction at existing sources through the assessment on the new source. The mechanism is already available to the City under State Law 121A which allows Boston to negotiate payments in lieu of taxes for development of benefit to the City.

Task 3: Municipal Energy Conservation. A third area in which offsets can be developed is energy conservation. In addition to helping the national energy shortage and reducing operating costs, fuel conservation will reduce emissions of all pollutants. In addition to offset, this will create air space for new development that would have problems with the PSD regulations for pollutants with attainment status.

The City can insulate its buildings, train personnel in equipment maintenance procedures, and employ non-fossil fuel dependent energy sources.

Task 4: City-wide energy conservation program. In addition to the efforts of the City government to control its own sources of pollution, it will develop a program to assist the entire City in reducing fuel consumption and thus pollution production. Since fuel conservation is not prescribed in the SIP, any reduction by this technique would be eligible to be considered as offset or PSD space. Although the amount of offset produced by any one source is liable to be so small as to be nearly insignificant, Boston has well in excess of 100,000 oil burners. If each of these reduced its fuel requirements by even 30%, a useable amount of offset could be obtained from this one form of energy consumption.

Since the offset produced by energy conservation would not normally be available for use or sale by the producer, because the quantity would be too small to be worth measuring, the City will develop a mechanism to acquire the offset in return for technical and financial assistance toward energy conserving improvements. The actual producer of the offset (the building owner) will be compensated by reduced energy expenses.

In order to make this program work, the City will enlarge existing programs that provide technical and financial assistance to owners of residential and commercial structures for energy savings improvements and other rehabilitation. These programs are currently funded with CDBG funds and provide technical assistance plus direct rebates amounting to between 20% and 50% the estimated value of the improvements.

To provide an accurate picture of the energy conserved and the resultant emission reduction, the City will work with the appropriate State and Federal agencies to develop a sampling and modeling program. By





use of statistical techniques, this program will estimate overall city results from detailed information on a selected sample of units. AQTA will only be used for this sampling and modeling program. Funding for the energy conservation efforts will come from other sources.

The offset produced under this work item will be pooled with the offset produced by the City as described in the previous section and sold to new or expanding companies that are assisting Boston meet its economic development goals. Proceeds from the sale of the offset will finance continuation of this effort after the end of the demonstration program. Because of the large number of independent decision makers involved and the lack of any coercive aspects, it is expected that this program will continue to produce new offset for several years after the end of the demonstration program.

An annual evaluation program will be undertaken to determine:

- o Quantity of offsets created.
- o Effectiveness of technical assistance programs.
- o Effectiveness of financial assistance program (including the extent to which private funds are leveraged).
- o Accuracy of sampling program.
- o New techniques for energy conservation.

## Strategy 2: Allocation of City-owned Offsets.

### Task 1: Establish a Mechanism for Distribution of City-owned Offset.

A key element in the Boston proposal is the generation of offset credits by the City itself, through a combination of emission reductions imposed on activities it directly or indirectly controls and a series of energy conservation measures. Thus the City will be in a position to do more than facilitate the operation of a private market in emission offsets. As a provider, the city can also make available its offset credits to the new source or sources of its choice, in line with its own economic development strategy and priorities.

Under the AQTA grant the City would establish a mechanism to allocate the offset credits generated through its own efforts. The strategy for allocating these offsets would reflect an explicit linkage between the City's air quality planning efforts and its CEDS work program. As a general rule, priority for obtaining offsets would be given to local firms seeking to expand existing operations. The City would also use available offsets to attract new types of industries consistent with growth and diversification targets established in the CEDS. Within air quality constraints, an important test for judging new industries and expansions of existing firms alike would be the net economic benefit to the city expressed in terms of new jobs created and municipal tax revenues generated. Other important considerations include the specific location



of the firm within the City and the extent to which the new jobs are actually available to City residents. The proposed procedure for allocating City owned offset is described in a later section.

The offsets would be sold at a price designed to recover the costs incurred by the City in generating them. A special fund would be created to receive payments from the offset purchasers and to pay the costs of the City's emission reduction programs. Individual purchasers would pay a prorated share of these costs, their share reflecting the percentage of the total offset they bought.

Due to the complexity of the process of creating and selling emission offsets, and the need to relate it to economic development planning, Boston proposes that this second mode of operation be carried on by the Boston Redevelopment Authority. The BRA has the technical and managerial base on which to build such an intricate process and is already recognized by the Federal government as the chief economic and community development planning body for the city.

Massachusetts General Laws, Chapters 121A & B established that the BRA has the powers of the Planning Board of the City, plus the powers of the State Department of Community Affairs. The BRA's staff of approximately 295 persons includes planners, economists, environmental specialists, engineers, lawyers, architects, and management personnel.

The legal authority of the Boston Air Pollution Control Commission, the other principal actor, is provided in Section II, Air Quality.

Task 2: Develop an Analytical Capability to Allocate City-owned Offsets. Consistent with the City's CEDS objectives, emphasis will be placed on (a) retention of existing industries including the accommodation for expansion, and (b) attraction of new industry to fill the gap resulting from the decline of specific industries. To this end, Boston will develop a strategy whereby changes in industry composition will result in overall emission reduction and strengthening of the local economy. This can be achieved by allocating offsets accumulated by Boston to those firms whose operation will contribute to increased employment, payroll and property tax revenues.

The approach to the distribution of City-owned offsets will be built on the recognition that industries vary in their relative pollution emission levels, labor requirements, and taxpaying obligations. Operationally, these can be standardized in terms of their industry-specific ratios.

(a) Air pollution emission/output, (100 lb/\$)

These can be specified in terms of five specific emissions (i.e., carbon monoxide, hydrocarbon, oxides of sulfur, oxides of nitrogen and particulates).





- |                            |              |
|----------------------------|--------------|
| (b) Employees/output       | (persons/\$) |
| (c) Payroll/output         | (\$/\$)      |
| (d) Municipal taxes/output | (\$/\$)      |

Because these measures vary among industries, we propose to develop a method by which the four measures and their effects can be evaluated on a comparable basis.

- (a) Consideration of tradeoffs in emission between industries, and tradeoffs between emissions and employment, emissions and payroll, and emissions and taxes.
- (b) Consideration of actual establishments' performance within an industry as given by industry aggregate estimates. Included here are: size effects, and levels of operations associated with capacity utilization.
- (c) Development of measures of tradeoffs for larger establishments and other major sources.

To assist the City in evaluating the potential of offset transactions for emissions reductions and their effects on employment, payroll and municipal taxes, an analysis will be undertaken by the use of an existing economic input-output model for the Boston SMSA. For the purpose of this analysis the available model will be coupled to relevant matrices containing information on local emissions, labor, and taxes. Although the model is designed to provide estimates for the Boston SMSA, it is also analytically capable of providing estimates for the City of Boston. Both direct and indirect effects will be examined for the development of the tradeoff evaluation procedure pertaining to the four measures. This procedure will lead to the development of an operational strategy by which priorities in tradeoff allocations can be undertaken.

Once these techniques and tradeoffs are established, the methodology will be available to other large communities or groups of communities in the Boston Metropolitan area. More than half the major metropolitan areas in the country have existing input-output tables of sufficient detail to utilize the procedures we will develop.

### Strategy 3: Establish Offset Information Clearinghouse

The minimum position the City would occupy in an offset process would be that of facilitator or broker of individual offset transactions. The AQTA demonstration grant would be used to create an information clearinghouse designed to support an essentially private market in the development and exchange of emission offsets. The rationale for providing such a central clearinghouse is to help improve the efficient functioning of the private market and enable the City to influence individual offset transactions in ways consistent with broader economic development objectives.



There are a number of useful ways in which a citywide clearinghouse could help create a more efficient market for private buyers and sellers of emission offsets. It will help firms seeking to locate or expand in the city to define the direct and indirect emissions likely to be associated with the proposed new facility. It will also provide them guidance as to the emission offset credit required and any geographic limitations on potential offset sources. By maintaining an up-to-date emission inventory the city can help identify specific candidates for supplying offsets. Sources willing to participate as offset candidates would be listed with the clearinghouse and made available to new source applicants.

Once having put the parties in touch, the clearinghouse could also provide technical assistance to help them estimate the costs of generating the required offset and, hence, its market value. Offset candidates should be selected on the basis of not only the amounts of offset credit available but also the relative costs per unit of emission reduction.

Finally, a clearinghouse mechanism will help focus the City's broader economic development interest in individual offset transactions and ensure that it is taken into account. The City has an interest that offset candidates which are to be shut down should not result in unduly adverse social, economic or employment impacts. A clearinghouse operation could help steer individual firms seeking to locate or expand within the city away from offsets which would undermine existing economic development strategies and toward those where negative impacts would be minimized. For specific proposed offsets where the potential for economic disruption is high, the clearinghouse could make impact assessments available to the state air pollution agency for consideration as part of its new source review procedure. On the demand side, the city also has an interest in attracting and retaining firms whose activities will tend to further its own positive economic development goals and plans. The clearinghouse could express this interest by concentrating its brokerage efforts on those offset transactions which would bring the maximum benefit to the city in terms of new employment opportunities and tax ratables.

At a minimum, the AQTA demonstration grant would be used to establish an offset clearinghouse which would perform these specific facilitating or brokerage services in support of a private offset market. The needed staff and institutional capability would be built up within the Boston Air Pollution Control Commission, which currently administers the City's parking freeze. Grant funds would be used to supplement the Commission's existing technical staff in the areas of emission inventory development, pollution control engineering and socio-economic impact assessment.





#### Strategy 4: Provide Technical Assistance

Task I: Establish and Administer the Service. This task will include responsibility for coordinating and administering all tasks required to establish an effective technical assistance (TA) service. Operating in the BRA, under the direction of the Project Manager, staff will:

- o prepare task orders for contractor services
- o respond to phone inquiries from potential clients
- o forward the names of sources which are assigned priority for technical assistance to contractors
- o monitor the work of technical assistance consultants, and
- o process applications for financial assistance.

In addition, this task will involve publicizing the availability of this service. This will include contact with all relevant trade associations including the Chamber of Commerce, the Associated Industries of Massachusetts, and the Small Business Association of New England, as well as all local, State, and Federal environmental and economic development agencies to insure that basic information will be made available to all existing sources as well as to new firms considering a development in the Boston area. As part of this publicity effort, a handbook will be prepared as described under Task III below.

Task II: Review Source Inventory: With the assistance of a technical consultant, the project director will review the emission inventory covering all local air pollution sources prepared as part of the SIP. Priorities for technical and financial assistance will be established from the review and analysis of these sources. This will be performed in concert with the development of a strategy for allocation of offsets (discussed in a separate section). The resulting priorities will reflect:

- o whether the source is presently in compliance with the SIP
- o whether the source, in compliance or not, could economically achieve sufficient reduction to create an offset
- o whether the source provides substantial or essential employment, tax revenues, or other services to the metropolitan area
- o whether the locally available expertise can help create the innovative technology which will produce compliance or an offset.

The CEDS Advisory Committee will be actively involved in the development of these priorities, so that these policies will be coordinated with other economic development efforts. A marketing strategy based on the source inventory and the priority system will be developed to direct the program's efforts at those sources most able to contribute to the reduction of pollution levels.



Special efforts will be made in the review and inventory to identify sources where the potential value of the offset produced by closing the plant approaches the value of the plant. These firms will be given a high priority for technical and financial assistance.

Task III: Prepare TA Handbook. A very brief (ten page) handbook will be prepared for distribution to potential clients in the City of Boston. It will include the following:

1. Short summary of Clean Air Act Requirements.
2. Current status of regulatory requirements by the Boston Air Pollution Control Commission, the Massachusetts Department of Environmental Quality Engineering, and EPA.
3. Anticipated regulatory requirements.
4. The specific services available from the Boston TA Service.
5. Specific steps to take, forms to complete, and people to contact to request technical and/or financial assistance.

This handbook will be distributed to individual sources listed, to all trade associations, to any emission source requesting assistance, and to all sources not in compliance with SIP requirements. All necessary steps will be taken including public service announcements to make Boston firms and the general public aware of the availability of the handbook.

This handbook will be made available to other cities interested in following Boston's lead in providing technical assistance.

Task IV: Provide Technical Assistance. The City will provide the following types of technical assistance:

- o Engineering advice regarding the control technologies available to meet emission levels required by the SIP for the individual source in question.
- o Engineering advice on basic problems and costs likely to be encountered by the installation and maintenance of required control technology.
- o Any alternative technologies to the source's basic process or its emission controls which might improve upon the required control technology.
- o Assistance to all sources in selecting and making the best use of engineering, financial, management, or other contractors.
- o Assistance with financial evaluation of any investment alternative which may exist within the regulatory requirements.





- o Assessments of emission control options which would improve upon SIP requirements, thus creating an offset. This assistance would include estimates of the cost and potential market value of the offset which could be used to reduce the initial costs.
- o Other financial and management assistance in interpreting, projecting, or participating in the market for emission offsets.

It is anticipated that technical assistance will supplement, but not replace, the need for a source to obtain its own engineering service, especially for final design or specification of control technologies to be utilized.

This technical assistance will be provided by a team of pollution control and related specialists under the direction of a technical assistance project monitor. The team will be made up of specialists from the City, engineering and management consulting firms, along with experienced individuals made available on a loan basis by Boston firms.

Initially, this assistance will be offered to trade associations, or to groups of firms identified as having similar emission characteristics in Task II (the review of the source inventory). One objective of this task will be to spread the impact of the information. A second objective will be to provide a mechanism for the collective purchase of pollution control equipment, wherever such cooperative arrangements are able to reduce unit costs to participating firms.

The third objective of this task will be to provide assistance directly to individual emission sources. Priority will be assigned to assistance requests in accordance with the results of the inventory review in Task II.

This assistance will be supported by funds from the grant during the first year of the operation. However, additional funds will be required to continue and expand the assistance. The proceeds from the sale of offsets owned by the City of Boston will be partially utilized for this purpose. The scope of assistance will therefore depend on the amount of this revenue and the City's determination of the best allocation of these funds.

Strategy 5: Providing Financial Assistance. A financial assistance program will be developed to assist clients to secure funds for financing their emission reduction programs. This financial assistance will be provided on a priority basis according to the criteria established in Technical Assistance Task II. Higher priority will go to those sources which might be required to close by the cost of required control equipment or by the potential value of this effect. A financial assistance advisor will work both with the individual recipients of financial aid as well as with the various sources of private and public funding for pollution abatement equipment.



Specific sources of funding that will be developed include:

- o Industrial Development Finance Authority Bonds providing tax-free, low-interest loans.
- o Use of Chapter 121A Urban Redevelopment Corporation authority providing special tax benefits for other payments made in lieu of taxes.
- o Special private sector financing.
- o Federal revolving loan programs (HUD, EDA, EPA) passed through the City for research, demonstration, and economic development.
- o Incentives through selling city-owned offset at lower than market value.
- o Experimental funding mechanisms that may be developed.

#### Evaluation Program

Boston's evaluation process will have three separate components. Immediately after approval of the grant and continuing through the approval of the Massachusetts SIP, we will develop quantifiable objectives for each of the work elements outlined on the previous section and described in detail in the text of the report. The objectives will be based on the best information on pollution levels and available pollution control equipment as well as on requirements included in the SIP.

The second section of the evaluation program will be a comparison of the work elements to the objectives established for them. These evaluations will keep the project on track and provide the basis for mid-course correction. They will also allow the sponsoring Federal agencies to determine which programs should be recommended to other cities at the earliest possible time.

An end-of-project review will be the basis for a final project report and a determination by the City of which programs to continue. Evaluation criteria will include:

- o Incremental improvement.
- o Quantity of offsets created.
- o Net change in employment and tax base as a result of economic development through the use of offsets.
- o General improvement in quality of life factors.
- o Effectiveness of alternative financing mechanisms.
- o Effectiveness of the technical assistance to private industry.
- o Effect on area-wide economic development patterns.





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VI. MANAGEMENT AND BUDGET



## Strategy 1: CREATION OF EMISSION OFFSETS BY CITY GOVERNMENT ACTION

Tasks	Schedule								Manmonths				(\$000)
	Year 1				Year 2				Mgmt	Tech.	Consult	Total	
	1	2	3	4	1	2	3	4					
1. Emission Inventions									1	6	3	10	50
2. Cost/Benefit Analysis									--	2	2	4	15
3. Municipal Energy Conservation													0
4. City-Wide Energy Conservation													0



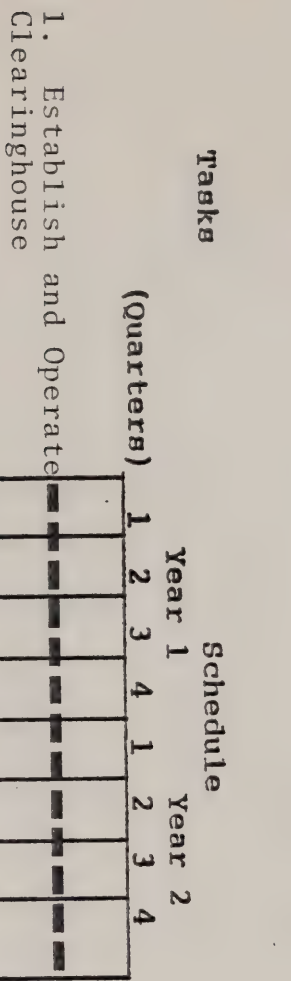


# Strategy 2: ALLOCATION OF CITY OWNED OFFSETS

Tasks	Schedule								Manmonths				AOTA GRANT Costs	
	(Quarters)	Year 1				Year 2				Mgmt	Tech.	Conslt	Total	(\$000)
		1	2	3	4	1	2	3	4					
1. Establish a mechanism to allocate city offsets										2	4	6	12	50
2. Develop an Analytical Capability to Allocate Offsets										1	9	8	18	75



# Strategy 3: ESTABLISH AN OFFSET - CLEARINGHOUSE



Manmonths				AOTA GRANT Costs (\$000)
Mgmt	Tech.	Conslt	Total	
4	12	2	18	75





# Strategy 4: PROVIDE TECHNICAL ASSISTANCE

Tasks	Schedule								Manmonths				AOTA GRANT Costs	
	(Quarters)	Year 1				Year 2				Mgmt	Tech.	Consult		Total
		1	2	3	4	1	2	3	4					
1. Establish and Administer Service	■	■	■	■	■	■	■	■	■	1	6	--	7	150
2. Review Service Inventory	■	■								--	3	3	6	
3. Prepare Handbook		■								--	1	--	1	
4. Provide Technical Assistance			■	■	■	■	■	■	■	2	5	15	22	

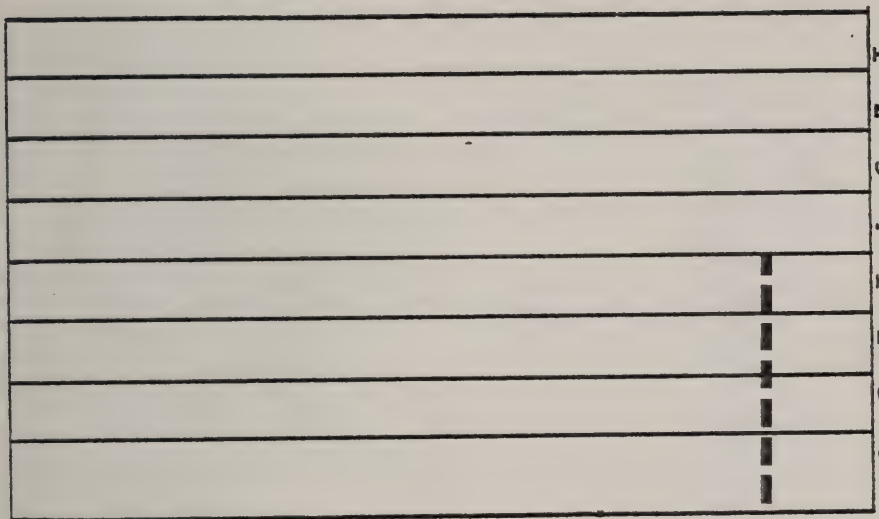


**Strategy 5: FINANCIAL ASSISTANCE**

**Tasks**

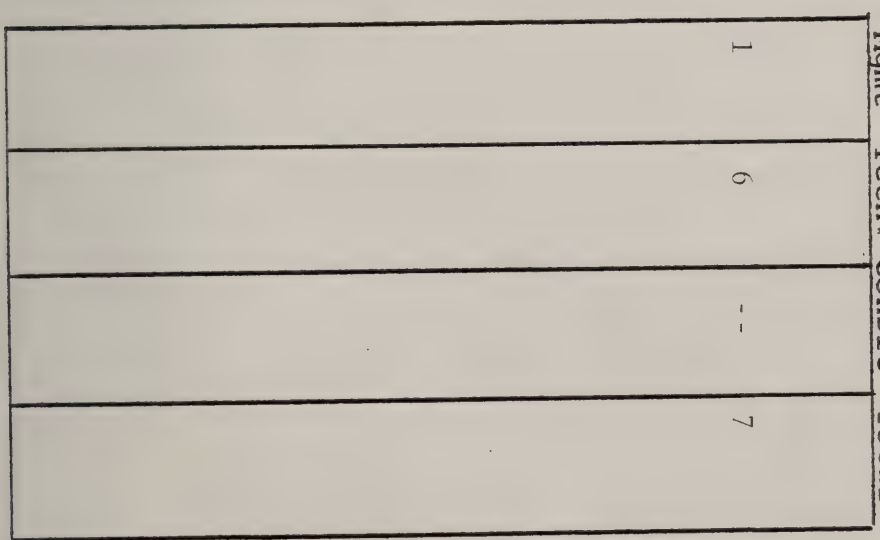
**Schedule**  
 Year 1      Year 2  
 (Quarters) 1 2 3 4      1 2 3 4

1. Provide Financial Assistance



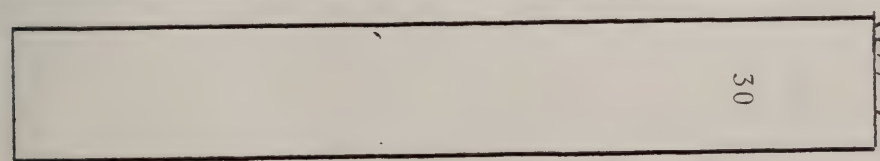
**Manmonths**

Mgmt Tech. Conslt Total



**AQTA  
GRANT  
Costs**

(\$000)





## Strategy

Tasks	Schedule								Manmonths				AOTA GRANT Costs
	Year 1				Year 2				Mgmt	Tech.	Consult	Total	
	(Quarters) 1	2	3	4	1	2	3	4					
1. Program Director									24	--	--	24	100
2. Evaluation									2	2	2	6	25





Strategy TOTAL

Tasks

Schedule  
 Year 1 Year 2  
 (Quarters) 1 2 3 4 1 2 3 4

Manmonths

Mgmt Tech. Consult Total

AQTA  
 GRANT  
 Costs

(\$000)

Strategy

1

2

3

4

5

Management  
 Printing, Travel &  
 Employee Training

TOTAL



65
125
75
150
30
125
30
600



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A-95 REVIEW FORMS  
LETTERS OF SUPPORT





RESOLUTION AUTHORIZING FILING OF AN APPLICATION WITH THE  
DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT FOR AN AIR QUALITY  
TECHNICAL ASSISTANCE GRANT

WHEREAS, the Boston Redevelopment Authority is the City's  
planning and redevelopment agency responsible for city-wide planning and  
for development planning related to the economic growth of the City, and

WHEREAS, the Department of Housing and Urban Development  
is making Air Quality Technical Assistance funds available to carry out  
a demonstration program related to economic growth and the attainment of  
clean air;

NOW, THEREFORE, BE IT RESOLVED BY THE BOSTON  
REDEVELOPMENT  
AUTHORITY

1. That Robert J. Ryan, Director, is hereby authorized  
to execute and file an application on behalf of the Boston Redevelopment  
Authority with the Department of Housing and Urban Development for a  
grant to support an Air Quality Technical Assistance demonstration  
program and

2. That the above named authorized representative is  
hereby authorized and directed to furnish such information as the United  
States Government may reasonably request in connection with the applica-  
tion which is herein authorized to be filed and further is authorized to  
accept any offer of grant which may be tendered by the Department of  
Housing and Urban Development.



## BOARD APPROVED.....

### RESOLUTION AUTHORIZING FILING OF AN APPLICATION WITH THE ECONOMIC DEVELOPMENT ADMINISTRATION FOR AN AIR QUALITY TECHNICAL ASSISTANCE GRANT

WHEREAS, the Boston Redevelopment Authority is the City's planning and redevelopment agency responsible for city-wide planning and for development planning related to the economic growth of the City, and

WHEREAS, the Economic Development Administration is making Air Quality Technical Assistance funds available to carry out a demonstration program related to economic growth and the attainment of clean air;

NOW, THEREFORE, BE IT RESOLVED BY THE BOSTON REDEVELOPMENT AUTHORITY

1. That Robert J. Ryan, Director, is hereby authorized to execute and file an application on behalf of the Boston Redevelopment Authority with the Economic Development Administration for a grant to support an Air Quality Technical Assistance demonstration program and

2. That the above named authorized representative is hereby authorized and directed to furnish such information as the United States Government may reasonably request in connection with the application which is herein authorized to be filed and further is authorized to accept any offer of grant which may be tendered by the Economic Development Administration.



# BOARD APPROVED.....

## RESOLUTION AUTHORIZING FILING OF AN APPLICATION WITH THE ENVIRONMENTAL PROTECTION AGENCY FOR AN AIR QUALITY TECHNICAL ASSISTANCE GRANT

WHEREAS, the Boston Redevelopment Authority is the City's planning and redevelopment agency responsible for city-wide planning and for development planning related to the economic growth of the City, and

WHEREAS, the Environmental Protection Agency is making Air Quality Technical Assistance funds available to carry out a demonstration program related to economic growth and the attainment of clean air;

NOW, THEREFORE, BE IT RESOLVED BY THE BOSTON REDEVELOPMENT AUTHORITY

1. That Robert J. Ryan, Director, is hereby authorized to execute and file an application on behalf of the Boston Redevelopment Authority with the Environmental Protection Agency for a grant to support an Air Quality Technical Assistance demonstration program, and

2. That the above named authorized representative is hereby authorized and directed to furnish such information as the United States Government may reasonably request in connection with the application which is herein authorized to be filed and further is authorized to accept any offer of grant which may be tendered by the Environmental Protection Agency.





# Boston Redevelopment Authority

Robert J. Ryan, Director

NOV 1 1978

Ms. Carla Johnston, Executive Director  
Metropolitan Area Planning Council  
44 School Street  
Boston, Massachusetts 02108

Dear Ms. Johnston:

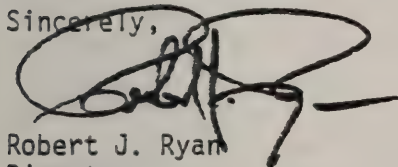
Re: Air Quality Technical Assistance Program Application

In response to the requirements of OMB Circular A-95, I am submitting herewith the Notice of Intent for an Innovative Grant Program to be carried out with financial assistance from the Department of Housing and Urban Development.

This proposal requests funding in the amount of \$500,000 to develop, implement and evaluate a program to bring Boston into compliance with Federal air quality standards while maintaining our progress in economic development. Four Federal agencies are coordinating this program and it is not yet clear which one will provide funding to Boston.

At the request of the Mayor and on behalf of his office, the Boston Redevelopment Authority will direct, manage and coordinate this program with appropriate City, State and Federal agencies.

Sincerely,



Robert J. Ryan  
Director



# Boston Redevelopment Authority

Robert J. Ryan, Director

NOV 1 1978

Mr. Frank Keefe, Director  
Office of State Planning  
Room 2101  
One Ashburton Place  
Boston, Massachusetts 02108

Dear Mr. Keefe:

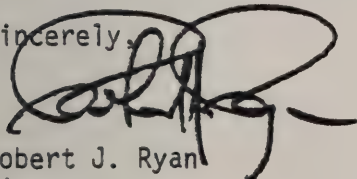
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This proposal requests funding in the amount of \$500,000 to develop, implement and evaluate a program to bring Boston into compliance with Federal air quality standards while maintaining our progress in economic development. Four Federal agencies are coordinating this program and it is not yet clear which one will provide funding to Boston.

At the request of the Mayor and on behalf of his office, the Boston Redevelopment Authority will direct, manage and coordinate this program with appropriate City, State and Federal agencies.

Sincerely,



Robert J. Ryan  
Director





## Notice of Intent Form

To apply for federal funds for programs covered by the Office of Management and Budget (OMB) Circular A-95

To be filed at least 30 days prior to submission to federal agency

### APPLICANT

Name City of Boston- Boston Redevelopment Authority  
Address 9th Floor Boston City Hall, One City Hall Square, Boston, MA  
Telephone Number 722-4300 02201  
Name and title of person to receive correspondence Robert J. Ryan, Director  
Name and title of contact person (if different) Marc Older, Acting Director  
of Comprehensive Planning

### PROJECT

Title Air Quality Technical Assistance Demonstration Program  
Location of project/impact area City of Boston, surrounding communities  
Starting date and project duration January 1, 1979, two years

### FUNDING AGENCY

Name This program is being funded by three different agencies  
Federal Catalogue Program Number the exact source of funds for the City is  
not yet known.  
Estimated date of submission to federal agency November 1, 1978 to EPA

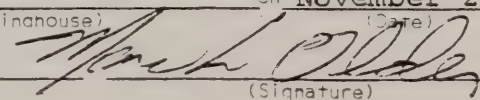
### FUNDING REQUEST

Federal approximately \$500,000  
State -0-  
Local contribution in staff services  
Other \_\_\_\_\_  
Total \_\_\_\_\_

### PROJECT SUMMARY

Please include at a minimum: narrative description of project, budget and/or cost estimate, and locus map (where applicable). The narrative might include a statement of need, program objectives, coordination with other agencies, citizen involvement, past performance (in the case of continuing programs), and environmental assessment where appropriate. (Use additional sheets where necessary.)

See Attachment

Sent to OSP and Metropolitan Area Planning Council on November 2, 1978  
(Name of Regional Clearinghouse) (Date)  
Prepared by Marc Older   
(Type or Print Name) (Signature)

### NOTE

Send white copy to State Clearinghouse, Office of State Planning, Room 2101, One Ashburton Place, Boston, MA 02108. (Phone (617) 727-4154). Send yellow copy to Regional Clearinghouse, retain pink copy for your records.

To be filled in by State Clearinghouse SCI \_\_\_\_\_



## THE AIR QUALITY TECHNICAL ASSISTANCE PROGRAM

This joint effort sponsored by the Environmental Protection Agency and the Departments of Housing and Urban Development, Commerce (Economic Development Administration), and Transportation is designed to assist cities develop programs that will enable them to meet the air quality standards established by the Clean Air Act Amendments of 1977, and maintain a program of economic growth and development. If selected to receive funds under this program, Boston will develop specific mechanisms to do one or more of the following: create sufficient reduction in pollution levels to allow for new industrial growth; develop legal and administrative measures to monitor and distribute the available air pollution off-set to achieve the City's economic development goals (as developed under the CEDS process); and/or to locate new development within the City in such a way that adverse impacts on air quality are avoided.

Details on Boston's proposal are not firm at this time because information on the program's requirements and application procedure were received October 31.





Metropolitan Area Planning Council  
44 School Street Boston, Massachusetts 02108

Carla B. Johnston  
Executive Director

(617) 523-2454

November 21, 1978

Mr. Mark Older  
Acting Director of Comprehensive Planning  
Boston Redevelopment Authority  
9th Floor  
Boston City Hall  
Boston, Massachusetts 02201

RE: The City of Boston's Application for the Air Quality  
Technical Assistance Demonstration Program  
(MAPC #PN-79-29)

Dear Mr. Older:

In accordance with the provisions of the U.S. Office of Management and Budget Circular A-95, the Metropolitan Area Planning Council, as metropolitan clearinghouse, has reviewed the above referenced application. The MAPC finds this proposal clearly consistent with established regional policies pertaining to economic development, energy, and air quality.

As the metropolitan region's largest municipality, it is vital that the City of Boston undertake a leading role in this region's effort to achieve national air quality standards. A successful pollution abatement effort in Boston lessens the burden on the remainder of the region's communities in terms of the relative stringency of abatement programs. The above referenced proposal, if funded will allow the City of Boston to assume this strong and necessary role in the regions air pollution abatement efforts.

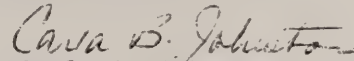
Specifically, the MAPC supports the public and private energy conservation emphasis of this proposal. By the end of December, the MAPC and the Massachusetts Energy Office will have trained Energy Conservation Managers (ECM's) in over 83 MAPC member communities. These ECM's have responsibilities for organizing and achieving reductions in fuel consumption within a community's municipal and school buildings. Substantial fuel savings have occurred through this program, in some instances up to 30% reduction. The MAPC believes that an energy conservation emphasis in the City of Boston is most appropriate, as it will not only lead toward valuable and easily documented reductions in air pollution, but will also help generate the relatively large economic benefits associated with reduced fuel consumption for both the public and private sectors. The MAPC will assist the City as needed in the establishment of this program component.





Additionally, the MAPC believes that much of the data relating specific pollutants to economic measures will prove valuable to the entire region. Currently, there is no readily useable data base within the region which communities can use to judge the "stationary source" air pollution consequences of specific economic activities. An inventory and analysis of these relationships would be a valuable contribution to air quality planners throughout the region.

Very truly yours,



Carla B. Johnston  
Executive Director

CBJ:lpb

cc: Mr. Frank Keefe

Office of State Planning





THE COMMONWEALTH OF MASSACHUSETTS

OFFICE OF STATE PLANNING

JOHN W. McCORMACK BUILDING ROOM 2101

ONE ASHBURTON PLACE

BOSTON, MASSACHUSETTS 02108

(617) 727-5066

MICHAEL S. DUKAKIS  
GOVERNOR

FRANK T. KEEFE  
DIRECTOR

November 20, 1978

Mr. Robert Ryan, Director  
Boston Redevelopment Authority  
City Hall - 9th Floor  
Boston, MA 02201

Re: A-95 Review/Air Quality Technical Assistance  
State Application Identifier: 78III620

Dear Mr. Ryan:

Your notice of intent requesting \$500,000 from the Environmental Protection Agency, and other Federal agencies as part of a joint Federal program has been received for review. This program will enable the city to continue its economic development efforts while working to meet the goals of the Clean Air Act Amendments of 1977.

As the Governor's designated State Clearinghouse, our review follows the guidelines of OMB Circular A-95. It is designed to provide advisory comments on the consistency of your proposal with State plans, policies, and objectives.

During our review of your proposal, a summary was published in the A-95 Review Monitor which is distributed to over fifty State agencies. Any interested agency was provided with the opportunity to evaluate your proposal for consistency with its particular policies and objectives. Any comments received will be forwarded upon receipt.

The Office of State Planning has reviewed your proposal for consistency with the State's growth policy. This effort is essential to the city's continuing effort to strengthen and revitalize its economic base. It is a project consistent with the State's growth policies and deserving of Federal support.

Sincerely,

FRANK T. KEEFE  
Director of State Planning

/lms  
cc: Marc Older, BRA  
MAPC





# Massachusetts Technology Development Corporation

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November 27, 1978

Robert J. Ryan, Director  
Boston Redevelopment Authority  
Boston City Hall  
Boston, Massachusetts 02201

Dear Mr. Ryan:

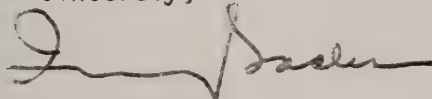
We are very happy to offer our support of the Boston Redevelopment Authority's request for assistance under the Air Quality Technical Assistance Program.

I have reviewed the major tasks which would be undertaken under this program and I am very pleased to see that the City of Boston views the need for achieving better air quality standards as an opportunity for using innovative, alternative technologies. The commercialization of these new technologies can spawn new businesses and new, primary employment opportunities for the citizens of Boston and the surrounding community.

Further, I support the efforts of the city to seek to develop a fair and equitable process to assure that local needs and goals are considered in the process of seeking to maintain and, where necessary, improve air quality.

If our organization can be of any assistance to the Boston Redevelopment Authority as this program evolves, please don't hesitate to let me know.

Sincerely,



Irving Sacks  
President

IS/el







THE COMMONWEALTH OF MASSACHUSETTS  
ENERGY OFFICE

73 TREMONT STREET • BOSTON, MA 02108

(617) 727-4732

MICHAEL S. DUKAKIS  
GOVERNOR

28. XI. 78.

HENRY LEE  
DIRECTOR

Robert J. Ryan, Director  
Boston Redevelopment Authority  
1 City Hall Square  
Boston, Massachusetts 02201

Dear Mr. Ryan:

On behalf of the Massachusetts Energy Office, let me inform you that we have reviewed the work elements of the proposed "Air Quality Technical Assistance Program" for which you will be seeking funding under President Carter's Urban Policy effort. The proposal appears comprehensive and intelligent in design. The Energy Office can and does lend its support to you in making the application and should the application prove successful, in the execution of the work elements. The energy-environment nexus and the problem it presents are vital areas of concern to the City's economic future.

Yours truly,

A handwritten signature in dark ink, appearing to read "James Connelly", with a long, sweeping flourish extending from the bottom right.

James Connelly  
Deputy Director

JC/ed





*The Commonwealth of Massachusetts*  
*Department of Public Health*  
*Lemuel Shattuck Hospital*  
*170 Morton Street, Jamaica Plain 02130*

TELEPHONE: 522-8110

November 20, 1978

To whom it may concern:

I am a chest physician actively involved in the daily care of patients suffering from various lung diseases. Air pollution is my major concern because of the severe difficulties it causes my patients.

I reviewed the Boston Redevelopment Authority Proposal dealing with the problems of air pollution and economic development in Boston. I strongly support this proposal and feel the implementation would be of great benefit to the people of Boston, especially for those who are susceptible to lung disease because of elevated environmental pollution.

If any further information is needed, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "S. Ishkawa".

Sadamu Ishkawa, M.D., F.C.C.P.  
Associate Professor of Medicine  
Tufts University School of Medicine  
Director, Pulmonary Function Laboratory  
Board Member, American Lung Association of Boston

SI/lis







# BOSTON HARBOR ASSOCIATES

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November 27, 1978

Mr. Marc Older  
Acting Director of  
Comprehensive Planning  
Boston Redevelopment Authority  
1 City Hall Square  
Boston, MA 02201

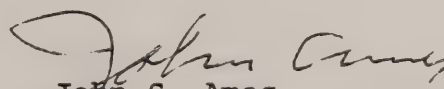
Dear Marc:

I understand the city of Boston has a chance to acquire some federal assistance for the development of a demonstration program or programs to improve its air quality while continuing to try to attract industry. The Boston Harbor Associates have long advocated creative approaches for attracting jobs and tax dollars to Boston, specifically in the Harbor area.

It is hard to imagine anyone being against an effort which has as a dual thrust - less pollution and more jobs. Needless to say we favor the concept of offset demonstration programs, with the codicil that it would be better in our view to have all offset transactions (public and private) handled under the same set of criteria.

Good luck.

Sincerely,

  
John S. Ames

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DEPARTMENT OF HEALTH AND HOSPITALS



DAVID L. ROSENBLOOM  
Commissioner

818 HARRISON AVENUE  
BOSTON, MASSACHUSETTS 02118

November 30, 1978

Marc Older  
Acting Assistant Director  
Comprehensive Planning  
Boston Redevelopment Authority  
1 City Hall Plaza  
Boston, MA 02201

Dear Mr. Older:

I congratulate you for having your Air Quality Technical Assistance Proposal qualify for the final evaluation. This program would fulfill the much needed role of coordinating the City's Employment and Air Pollution policies. As the agency charged with upholding the Public Health in the City of Boston, the Department of Health and Hospitals particularly supports your efforts to control the latter.

Your proposal contains a feature which would bank emissions reductions and then distribute the pollution allowances enabled by the offset. This is a development of major importance. The "bank" would greatly ease the task of establishing the preliminary environmental feasibility of our proposed Resource Recovery Facility (RRF). The RRF will achieve some goals of your proposal by serving as a major new source of steam at a smaller environmental cost than the sources it will replace.

The coordinating authority would also reduce the uncertainty which now plagues the City economic development efforts.

I appreciate the opportunity to review the proposal, and I look forward to working with you to develop criteria by which the pollution allowances will be distributed. I am sure the City will enjoy significant economic and health benefits from the program.

Sincerely,

David L. Rosenbloom  
Commissioner  
Department of Health and Hospitals

DLR/sk/kr

















